

## CIVIL RIGHTS ENTERPRISE SYSTEM

### D. Privacy Impact Assessment

1a. Explain how the system and its use will ensure equitable treatment of customers and employees.	The core requirements of the planned system are geared to ensuring equitable treatment of customers and employees. It will improve the timeliness of complaint processing, add business rules to eliminate many routine data entry errors, and improve the retrieval of supporting documents.
2a. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?	The system will be Web-based, and the information will reside on only one server.
2b. Explain any possibility of disparate treatment of individuals or groups.	Not applicable.
2c. What are the retention periods of data in this system?	<p>EEO complaint case files are retained for four years after resolution of the case (General Records Schedule 1, Item 25).</p> <p>Program complaint case files are also retained for four years after resolution of the case (4300 series in Records Group 16).</p> <p>The exception would be CR records which are considered historical which will be retained permanently. Examples include records of major court cases (such as Pigford) and those of a CR Action Team (CRAT) and a CR Implementation Team (CRIT).</p>

<p>2d. What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?</p>	<p>Records shall be eliminated in accordance with the NARA Code of Federal Regulations. Disposition shall assure the elimination of privacy and other sensitive information. Electronic media shall not be reused if the previously recorded information can be accessed. USDA Records Management Policy is documented at <a href="http://www.ocio.usda.gov/irm/records/policy.html">http://www.ocio.usda.gov/irm/records/policy.html</a> and specific procedures for CRES will be documented in the SSP.</p>
<p>2e. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely, and complete to ensure fairness in making determinations?</p>	<p>The system will perform case tracking which is intended to identify the status of each case—and enable Agency and CR managers to make sure each case moves forward in a timely manner.</p> <p>CR and the applicable USDA Agency double-check status with each other. In addition, complainants have a right to submit documents and, when available, review the Report of Investigation (ROI) and respond.</p>
<p>3a. Is the system using technologies in ways that the USDA has not previously employed (e.g. Caller-ID)?</p>	<p>All of the technologies—such as Web-based applications, document scanning, and database management—are well established and proven at USDA.</p>
<p>3b. How does the use of this technology affect customer/employee privacy?</p>	<p>The technology uses the same general information that was available during the “paper document” era of the 20<sup>th</sup> century. The system simply makes the information available more quickly and reliably.</p>
<p>4a. Will this system provide the capability to identify, locate, and monitor <u>individuals</u>? If yes, explain.</p>	<p>Yes. The system identifies names, addresses, and phone numbers. Certain implementations could also identify the complainant’s Social Security Number.</p>
<p>4b. Will this system provide the capability to identify, locate, and monitor <u>groups of people</u>? If yes, explain.</p>	<p>Yes, certain cases are “class action” complaints and may be grouped together. To illustrate hypothetically, all complaints based on alleged discrimination of a certain program against</p>

	single-parent women might be grouped together as part of a class action case.
4c. What controls will be used to prevent unauthorized monitoring?	<p>Access to the overall system will be password protected and limited.</p> <p>System users will have role-based access, and they will only have access to cases (1) to which they or their immediate workgroup have been assigned, or (2) other role-defined access.</p> <p>Except for summary statistical purposes, closed cases will become inaccessible except under clearly defined cases (i.e., the case is re-opened).</p> <p>System users will be given Rules of Behavior and required to agree to the terms of access before being given a password.</p>
5a. Under which Systems of Record Notice (SOR) does the system operate? Provide number and name.	A SOR shall be published prior to deployment of the system. CRES has not yet been approved for acquisition and implementation.
5b. If the system is being modified, will the SOR require amendment or revision? Explain.	Not Applicable.